

1 J. Stephen Peek (1758)  
2 Jon T. Pearson (10182)  
HOLLAND & HART LLP  
3 9555 Hillwood Drive, 2nd Floor  
Las Vegas, NV 89134  
702.669.4600  
4 702.669.4650 fax  
speek@hollandhart.com  
5 jtpearson@hollandhart.com

6 *Counsel for Plaintiff David Jonathan Thomas*

7 **UNITED STATES DISTRICT COURT**

8 **DISTRICT OF NEVADA**

9 David Jonathan Thomas,

Case No. 3:13-cv-00508-RCJ-CLB

10 Plaintiff,

**Stipulation and Order Extending the  
Deadline to Submit a Stipulation  
Dismissing this Lawsuit**

11 v.

12 Isidro Baca, *et al.*,

13 Defendants.

14  
15 The above-captioned parties stipulate and agree as follows:

16 1. On August 4, 2021, the parties participated in a settlement conference before  
17 Magistrate Judge Carla Baldwin. The conference resulted in a settlement, and the material terms  
18 were placed on the record by the Court. The Court later entered its minutes and directed the  
19 parties to file a stipulation dismissing this action no later than September 3, 2021. (ECF No. 203).

20 2. Defendants have prepared a proposed settlement agreement, and counsel for  
21 plaintiff David Thomas has had relatively minor comments to that agreement. Under the proposed  
22 settlement agreement, however, Mr. Thomas will need to personally sign. Counsel for Mr.  
23 Thomas has scheduled an in-person meeting with Mr. Thomas on September 11. This was the  
24 soonest that counsel for Mr. Thomas could drive to Carson City, sit down with Mr. Thomas to go  
25 over the settlement agreement, and obtain Mr. Thomas's signature.

26 3. For these reasons, the parties request that the deadline to submit a stipulation  
27 dismissing this action be extended from September 3, 2021 to September 17, 2021.

HOLLAND & HART LLP  
9555 HILLWOOD DRIVE, 2ND FLOOR  
LAS VEGAS, NV 89134

1 **IT IS SO STIPULATED.**

2 Dated: September 3, 2021.

3  
4 /s/ Jon T. Pearson

J. Stephen Peek  
5 Jon T. Pearson  
HOLLAND & HART LLP  
6 9555 Hillwood Drive, 2nd Floor  
Las Vegas, NV 89134

7 *Counsel for Plaintiff David Jonathan Thomas*

8  
9 /s/ Douglas R. Rands

Aaron D. Ford  
Attorney General  
Douglas R. Rands  
Senior Deputy Attorney General  
State of Nevada  
Public Safety Division  
100 N. Carson Street  
Carson City, NV 89701-4717

10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28  
*Counsel for Defendants Isidro Baca,  
Scott Kahler, Kathryn Reynolds,  
James Stogner, and Elizabeth "Lisa" Walsh*

13 **IT IS SO ORDERED.**



14  
15 UNITED STATES MAGISTRATE JUDGE  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

DATED: September 7, 2021

17335456\_v1